

Attachment #1
AIR PERMIT
FOLDER LEVEL

AIR PA #: DB0378S 047455

File Type: PERMITS

Volume: 001

Inclusive Dates: 1/1/2004 - 12/31/2004

Media Code/ Form

- ☐ Microfiche
☒ Roll Microfilm
☒ Electronic Image

Files appearing on this roll of microfilm/ electronic image were filmed/ scanned as received and per instructions from the Texas Commission on Environmental Quality's Records Managemgent Coordinator, Kate Fitzpatrick.

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



SM

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 21, 2004

Mr. John Stromme
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

Re: Permit Withdrawal
Permit Number: 48785
Asphalt Roofing Line 1
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN600474753

Dear Mr. Stromme:

As you requested in your letter dated on June 13, 2003, we are withdrawing the Voluntary Emission Reduction Permit Application Number 48785. We understand that GAF Materials has agreed to authorize the Asphalt Roofing Line 1 by amending Permit Number 7711A. The above-referenced permit application is no longer necessary.

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former Texas Commission on Environmental Quality account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Thank you for informing us of the status of this application.

Sincerely,

A handwritten signature in dark ink, appearing to read "Glenn Shankle".

Glenn Shankle
Executive Director

GS/JAR/pll

Enclosure

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas, Environmental and Health Services, Dallas
Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth

Project Number: 82846

**Construction Permit
Review Analysis & Technical Review**

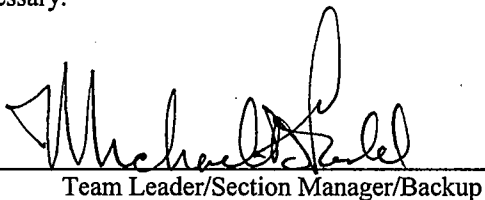
Company:	GAF Materials Corporation	Permit No.:	48785
City:	Dallas	Record No.:	82846
County:	Dallas	Account No.:	DB0378S
Project Type:	CRVW	Regulated Entity No.:	RN100788959
Project Reviewer:	Mr. Joshua Reddoch	Customer Reference No.:	CN600474753
Facility Name:	Asphalt Roofing Line 1		

Project Overview

GAF Materials submitted a VERP application to authorize asphalt roofing production line 1. The company chose to authorize this line by amending permit 7711A. The VERP is no longer necessary.


Project Reviewer

10/1/04
Date


Team Leader/Section Manager/Backup

10/05/04
Date

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Request for Refund

Instructions: To refund a payment, the program must complete and sign this form. Keep the goldenrod copy for your program's files, attach the program's copy of the cashier's receipt to the remaining copies, and return to Financial Administration/Revenue, MC-214. If you have any questions, please call Revenue at ext.0360.

1. Receipt No. E124646 2. Check No. 15337969
3. Receipt Amount: \$450 4. Refund Amount: \$450

Revenue Use Only	
<input type="checkbox"/> RUX	Receipt Date: _____
<input type="checkbox"/> CUX	Invoice Due Date: _____

5. Revenue Type (check one):

- | | | |
|---|--|---|
| <input type="checkbox"/> Administrative Penalty | <input type="checkbox"/> G.P. Wastewater (GPW) | <input type="checkbox"/> Sludge Stickers (WSS) |
| <input type="checkbox"/> Air Emissions (AEF) | <input type="checkbox"/> G.P. Water Discharge Applic. (GPA) | <input type="checkbox"/> Solid Waste Disposal (SWD) |
| <input type="checkbox"/> Air Inspection (EIF) | <input type="checkbox"/> Haz. & Nonhaz. Fac. (HWF/NWF) | <input type="checkbox"/> Surface Disposal (SDP) |
| <input checked="" type="checkbox"/> Air Permit (APF) | <input type="checkbox"/> Haz. & Nonhaz. Gen. (HWG/NWG) | <input type="checkbox"/> Toxic Reporting (TOX) |
| <input type="checkbox"/> Air Permit Renewal (PCF) | <input type="checkbox"/> Haz. Waste Permit (HWP) | <input type="checkbox"/> Voluntary Clean-up (VCP/ILP) |
| <input type="checkbox"/> Beneficial Land Application (BLP) | <input type="checkbox"/> Lab Accreditation | <input type="checkbox"/> Wastewater Inspection (WWI) |
| <input type="checkbox"/> Beneficial Land Use (WMB) | <input type="checkbox"/> Licenses (Identify type: _____) | <input type="checkbox"/> WW Trtmt. Research Cncl. (WTR) |
| <input type="checkbox"/> Board of Irrigators (IRR) | <input type="checkbox"/> Onsite installers Sewage Fac. (OIR) | <input type="checkbox"/> Water Quality Assessment (WQA) |
| <input type="checkbox"/> Certification Fees
(Identify type: _____) | <input type="checkbox"/> PST Registration (AST/UST) | <input type="checkbox"/> Water Quality Permit (WQP) |
| <input type="checkbox"/> Conferences/Seminars
(Identify Project # _____) | <input type="checkbox"/> Plumbing Fixture Stds. (PFS) | <input type="checkbox"/> Water Reg. Utility Assess. (WRU) |
| <input type="checkbox"/> Consolidated Water Quality (CWQ) | <input type="checkbox"/> Postage (PTG Type: _____) | <input type="checkbox"/> Water Use Assessment (WUF) |
| <input type="checkbox"/> DP Services
(Invoice #: _____) | <input type="checkbox"/> Public Health Service (PHS) | <input type="checkbox"/> Water Use Permit (WUP) |
| <input type="checkbox"/> Edwards Aquifer Applic. (EAS) | <input type="checkbox"/> Sale of CCN/Tsfr./Merger (PUF) | <input type="checkbox"/> Watermasters (STX/RGR) |
| <input type="checkbox"/> G.P. Stormwater (GPS) | <input type="checkbox"/> Sludge Haulers (WMS) | <input type="checkbox"/> Other
(Explain: _____) |

6. Check reason for refund:

- ☐ Overpayment ☐ Fee Not Required ☐ Duplicate Payment
- ☒ Applic. (Withdrawn) Returned, or Incomplete (Circle One) ☐ Applic. didn't require formal action by the full Commission
- ☐ Other (Please explain): _____

7. Fee was filed on behalf of: GAF Materials Corp.
Federal Employer ID # (or SSN): _____

Permit/Facility/Regis. #: 48785
A/R Account #: DB 03785

8. Check Payable to (should match payor on receipt):

Mailing Address (if different):

Name: GAF Materials Corp
Attn: Mr. John Stromme
Address: P.O. Box 655607
City, St., Zip: Dallas, TX 75265
Telephone No.: (214) 637-8942

9. Requested By:

[Signature]
Signature

Air Permit Reviewer
Title

239-6115
Phone Number

10/12/04
Date

10. Approved By:

[Signature]
Signature

Team Leader
Supervisory Title

1097
Phone Number

10/15/04
Date

FINANCIAL ADMIN. USE ONLY	
Agency Voucher No.:	Date: _____
Warrant No.:	Amount: _____
Request Processed By:	Date: _____
Approved By:	Date: _____
Comptroller Voucher No.:	Date: _____



GAF MATERIALS CORPORATION

1361 Alps Road Wayne NJ 07470-3689 • Tel: 973-628-3000

June 13, 2003

Mr. Earl Jones

Senior Permit Engineer

Mechanical and Combustion Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087

Austin, Texas 78711-3087

RECEIVED

JUN 18 2003

AIR PERMITS DIVISION

*Re: GAF Materials Corporation
Dallas, Texas*

Subject: Air Permit Renewal Application and VERP Permit Application
Combine Permit Applications into a Single Permit

Dear Mr. Jones:

This letter is submitted to confirm our discussions in which GAF agreed that the current air permit renewal application and the VERP permit application can be combined into a single permit for the permitted facility.

Based on our discussions, it is our understanding that combining these permit applications into a single permit will not subject the permit or applications to further public notices or public hearings before the final permit can be issued.

Should there be a misunderstanding about this situation, please call John Stromme, Plant Manager, at (214) 637-8942 or myself at (973) 628-3507.

Sincerely,

Fred Bright

Manager of Environmental Engineering

cc: Mr. Odis Lacey, GAF Materials Corporation – Dallas
Mr. John Stromme, GAF Materials Corporation - Dallas

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
RECEIPT

APR26,01

38680 ear N

ALPHA NAME (FEE DESCRIPT.)	ACCOUNT CODE	REGISTER# (REF.NO.1)	FAC/PER/PJT (REF.NO.2)	RCPT CODE	RECEIPT FORM	CHEQUE NUMBER	CARD NUMBER	TRANSAC. AMOUNT
ACCOUNT NAME (PAID FOR)			PAID IN BY NAME			BANK BRANCH	CARD AUTHORISE	USER DATA
AIR PERMIT FEES	APF	E124646		MLCK		15337969		\$ 450.00
NEW PI-1V/DALLAS PLANT			GAF MATERIALS CORPORATION			GB0378S	0	

Post-it® Fax Note 7671		Date	# of pages
To	<i>[Signature]</i>	From	<i>[Signature]</i>
Co./Dept		Co.	<i>Dechero of</i>
Phone #	<i>6115</i>	Phone #	
Fax #	<i>1300</i>	Fax #	

From: Earl Jones
To: "FBright@gaf.com".GWIA.GATEDOM
Date: 2/26/04 7:29AM
Subject: RE: Dallas Plant Permit 7711A

In my letter which you should get soon, I have requested modeling of all criteria pollutants, PM, PM10, NOx, CO, SO2, VOC. I do not think there is any lead.

>>> "Bright, Fred" <FBright@gaf.com> 02/26/04 06:41AM >>>

Earl,

We have contracted with Trinity Consultants to do this work. Due to their location (Dallas) and years of experience I felt they would know exactly what needs to be done. They will start work immediately.

- 1) In my discussions with them, I stated that PM/PM10 is the only pollutant needing evaluation (please confirm),
- 2) Any special requirements that they should incorporate?
- 3) Should I have them wait for the formal letter?

Fred

-----Original Message-----

From: Earl Jones [<mailto:EJONES@tceq.state.tx.us>]
Sent: Tuesday, February 10, 2004 12:16 PM
To: Bright, Fred
Subject: Dallas Plant Permit 7711A

Fred, I had our modeling group perform a screen model of the proposed PM and PM10 for your proposed permit 7711A. All NAAQS and state regulations were exceeded. We request that you perform an impact analyses for this proposed permit to show that it meets all federal and state regulations for criteria pollutants. I will send you a letter with this request.

Thanks Earl

Earl Jones - RE: Dallas Plant Permit 7711A

From: "Bright, Fred" <FBright@gaf.com>
To: "Earl Jones" <EJONES@tceq.state.tx.us>
Date: 2/26/2004 6:45 AM
Subject: RE: Dallas Plant Permit 7711A

Earl,

We have contracted with Trinity Consultants to do this work. Due to their location (Dallas) and years of experience I felt they would know exactly what needs to be done. They will start work immediately.

- 1) In my discussions with them, I stated that PM/PM10 is the only pollutant needing evaluation (please confirm),
- 2) Any special requirements that they should incorporate?
- 3) Should I have them wait for the formal letter?

Fred

-----Original Message-----

From: Earl Jones [mailto:EJONES@tceq.state.tx.us]
Sent: Tuesday, February 10, 2004 12:16 PM
To: Bright, Fred
Subject: Dallas Plant Permit 7711A

Fred, I had our modeling group perform a screen model of the proposed PM and PM10 for your proposed permit 7711A. All NAAQS and state regulations were exceeded. We request that you perform an impact analyses for this proposed permit to show that it meets all federal and state regulations for criteria pollutants. I will send you a letter with this request.

Thanks Earl

From: Raymond Pettit
To: Earl Jones
Date: 2/10/04 11:13AM
Subject: GAF Materials Corporation - PM/PM10 Screening Analysis Results...

Mr. Jones;

F.Y.I...Pursuant to our conversations, a screen modeling analysis indicates exceedances over the PM and PM10 standards occur for the evaluated emission sources you provided.

Therefore, please inform me or other staff of the Air Dispersion Modeling Team if you decide to have the company perform a refined ISCST3 modeling analysis as part of this application and would like to have it reviewed by us in the future.

Thank you.

Ray

CC: Dom Ruggeri; Robert Opiela

From: Earl Jones
To: "FBright@gaf.com".GWIA.GATEDOM
Date: 2/10/04 11:15AM
Subject: Dallas Plant Permit 7711A

Fred, I had our modeling group perform a screen model of the proposed PM and PM10 for your proposed permit 7711A. All NAAQS and state regulations were exceeded. We request that you perform an impact analyses for this proposed permit to show that it meets all federal and state regulations for criteria pollutants. I will send you a letter with this request.

Thanks Earl

01/26/2004 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 82846 PERMIT#: **48785** STATUS: **P** DISP CODE: _____
RECEIVED: PROJTYPE: RENEWAL: ISSUED DATE: _____
04/23/2001 **CRVW**
FEE DATE: FEE AMT: \$ 450 STDY1/SP: 0 SUP-DISP DATE: _____
04/25/2001

GROUP: PAR

PARSTAFF1: ROMERO, RONICA &

PARSTAFF2: MARTIN, PATRICIA

GROUP: M/A

TECHENGR : JONES, EARL

**ADMIN
REVIEW**

A - PAR RECEIVED : 08/20/2001 A - SITE REVIEW RFC : 02/14/2002 A - ACCT#/CR# REQ FROM REGION : 05/30/2002

A - ADMIN DEF CYCLE : 05/30/2002 A - TELECONS : 06/07/2002 A - PN DRAFT SENT TO COMPANY : 06/07/2002

A - LP DALLAS : 06/17/2002 A - TELECONS : 06/21/2002 A - TELECONS : 06/24/2002

A - ADMINCOMP : 06/25/2002 A - PAR TRANSFER TO APD : 06/25/2002 A - PN DRAFT APPROVED : 06/25/2002

A - 1ST PUBLIC NOTICE : 06/25/2002

ISSUED TO: GAF MATERIALS CORPORATION
COMPANY NAME: GAF MATERIALS CORPORATION
CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE
OFFICIAL *JOHN STROMME*

NAME: MR ROGER STEPHENS TITLE: PLANT MANAGER
PHONE: 214-637-8919 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: ASPHALT ROOFING LINE 1

SIC: 2952 REGION: 4 ACCOUNT: DB0378S REG ENTITY ID: RN100788959

SITE NAME: GAF MATERIALS CORPORATION

COUNTY: DALLAS CAPUNITS: UNITTYPE:

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD

PUBLIC NOTICEPUBLIC NOTICE PN1 ALT PN2 ALT
REQUIRED?: Y LANGUAGE: YES LANGUAGE: NO**EMISSION
RATES**

VERP : YES

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

PROJECT NOTES**TECHNICAL ACTIVITY HISTORY****PROJECT ATTRIBUTES****PROJECT LINK****PROJECTS/PERMITS VOIDANCE**

01/26/2004 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 75805 PERMIT#: 7711A STATUS: P DISP CODE: _____

RECEIVED: 09/28/2000 PROJTYPE: RNEW RENEWAL: ISSUED DATE: _____

FEE DATE: 09/26/2000 FEE AMT: \$ 2028 STDY1/SP: 0 SUP-DISP DATE: _____

PARSTAFF1: BLACK, RAMONA &

GROUP: M/A

TECHENGR : JONES, EARL

**ADMIN
REVIEW**

A - PAR RECEIVED : 09/28/2000 A - SITE REVIEW RFC : 10/10/2000 :CH : 10/10/2000

:SR : 10/10/2000 :PN : 10/16/2000 PN - APPROVED : 10/17/2000

A - PAR TRANSFER TO 10/17/2000 C:-PN : 10/17/2000 C:T-DEF : 10/24/2000
APD :

E:-PN? : 11/21/2000 E:-PN : 12/04/2000 C:T-DEF : 12/14/2000

E:T-DEF? : 01/21/2001 C:T-DEF : 02/27/2001 E:T-DEF? : 04/20/2001

E:T-DEF? : 05/04/2001 E:T-DEF? : 06/04/2001 :*CH : 01/11/2005

ISSUED TO: GAF MATERIALS CORPORATION

COMPANY NAME: GAF MATERIALS CORPORATION

CUSTOMER REGISTRY ID: CN600474753

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE

OFFICIAL *JOHN STROMME*NAME: ~~MR CESAR HAGE~~ TITLE: PLANT MANAGER

PHONE: 214-637-8919 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE, ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: ASPHALT & ROOFING MATERIALS MANUFACTURING FACILI

SIC: 2952 REGION: 4 ACCOUNT: DB0378S REG ENTITY ID: RN100788959

SITE NAME: GAF MATERIALS CORPORATION

COUNTY: DALLAS CAPUNITS: UNITTYPE:
 CAPACITY: CITY: DALLAS
 LOCATION: 2600 SINGLETON BLVD.

PUBLIC NOTICE

PUBLIC NOTICE PN1 ALT PN2 ALT
 REQUIRED?: Y LANGUAGE: NO LANGUAGE: NO

	PUB MEETING	PUB HEARING	MAILING LIST	COMMENTS
NUMBER OF REQUESTS:	0	1	1	1

PN - PUBLISH : 11/09/2000 PN - END OF PERIOD : 12/11/2000 PN - END OF PERIOD : 12/11/2000
 PN - HEARING REQUEST : 11/17/2001 PN - ED AGENDA POST : 01/02/2004

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

PROJECT NOTES

COM.STATUS: J:/everyone/rblack/75805.pn TT EJJ on 10/19/00

TECHNICAL ACTIVITY HISTORY

TR - ENGINEER RECEIVE PROJECT :	10/17/2000	TR - PROJECT RECEIVED :	10/19/2000	SUP - RECEIVED FROM PAR :	10/19/2000
TR - TECH DEF LTR SENT :	10/24/2000	TR - PN VERIFICATION :	11/21/2000	TR - SITE REVIEW RFC REPLY :	02/01/2001
TR - TECH DEF LTR REPLY :	04/23/2001	TR - TECH DEF LTR REPLY :	06/04/2001	TR - TECH DEF LTR SENT :	09/24/2001
TR - TECH DEF LTR REPLY :	12/12/2001	TR - TECH DEF LTR SENT :	04/05/2002	TR - 15 DAY NOD :	04/30/2002

TR - PN VERIFICATION :	07/04/2002	TR - COMP HISTORY REVIEW CMPLT :	10/01/2003	TR - PROJ TECH COMPLETE :	11/05/2003
TR - DFT PERMIT RFC SENT :	11/18/2003	TR - DRAFT PERMIT REVIEW :	11/18/2003	12/04/2003	TR - DFT PERMIT RFC REPLY :

PROJECT ATTRIBUTES

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

Earl Jones - RE: Dallas Plant draft permit

From: "Bright, Fred" <FBright@gaf.com>
To: "Earl Jones" <EJONES@tceq.state.tx.us>
Date: 11/24/2003 8:03 AM
Subject: RE: Dallas Plant draft permit

Earl,

Attached are copies of the DRAFT documents you forwarded.

I have indicated changes/corrections in red on each document.

Attached is a list of my markings:

- 1) "Static Copy of C21R GAF 7711A amend & renew.wpd" - one minor change: the Plant Manager is now John Stromme. Rogers Stephens is no longer with GAF.
- 2) "Static copy of MRT GAF 7711A.wpd" - on the first page, under "STILLYARD OPERATION", please delete EPN No. 28 "Nat. Gas Asphalt Heater Vent". This is a duplicate EPN No. 28 "Asphalt Heater Vent" on the third page under "LINE 3 OPERATION".
- 3) "Static copy of CND GAF Materials 7711A.wpd" - QUESTION: Page 1, Item 3 - does Subpart UU now apply to both Line #1 as well as #3, although Line #1 was built before the Subpart UU effective date?)
 [And on page 2, Item 6.B., I assume the colon after Thermal Oxidizer should be a period.]

Fred

(Copies of marked documents attached.)

<<Comments 11-24 -Static copy of C21R GAF 7711A amend & renew.wpd>> <<Comments 11-24-Static copy of MRT GAF 7711A.wpd>> <<Comments 11-24 -Static copy of CND GAF Materials 7711A.wpd>>

-----Original Message-----

From: Earl Jones [mailto:EJONES@tceq.state.tx.us]
Sent: Thursday, November 20, 2003 8:57 AM
To: Bright, Fred
Subject: Dallas Plant draft permit

<< File: WordPerfect 6.1 >> << File: WordPerfect 6.1 >> << File: WordPerfect 6.1 >> Fred, we have mailed this draft permit to Mr. Stephens at the Dallas Plant. I hope this method of sending you a copy is acceptable. If not, we will mail you a hard copy.

Thanks Earl

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM ₁₀	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO _x	0.10	0.43
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
28	Nat. Gas Asphalt Heater Vent	NO _x	0.59	2.60
		SO ₂	0.01	0.02
		PM ₁₀	0.05	0.20
		CO	0.50	2.20
		VOC	0.03	0.13
DELETE EPN No. 28 - this is a duplicate of EPN No. 28 under "LINE 3 OPERATION" (next page)				

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	AIR CONTAMINANTS DATA Emission Rates *	
			lb/hr	TPY**
BLR5	Standby Boiler Vent	NO _x	3.73	16.34
		SO ₂	0.02	0.09
		PM ₁₀	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92
8	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO _x	1.75	7.70
		SO ₂	0.73	3.20
		PM ₁₀	0.16	0.70
		CO	1.28	5.60
		VOC	0.09	0.40
COMMON TO LINE 1 AND LINE 3				
34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC	3.20	14.94
		PM ₁₀	3.43	15.02
98	Rail 2 Stack	PM ₁₀	4.63	4.59
		VOC	0.51	0.51
LINE No. 1 OPERATION				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM ₁₀	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM ₁₀	0.03	0.13
1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM ₁₀	0.59	2.58
1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM ₁₀	0.59	2.58

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM ₁₀	0.59	2.58
HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO _x	0.20	0.86
		SO ₂	0.01	0.01
		PM ₁₀	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
HTR2	Line 1 Thermal Fluid Heater Vent	NO _x	0.20	0.86
		SO ₂	0.01	0.01
		PM ₁₀	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	2.22	9.73
		PM ₁₀	4.00	17.52
LINE 3 OPERATION				
25	Sand Application Baghouse Stack	PM ₁₀	3.86	16.91
26A	Stabilizer Storage Baghouse Stack	PM ₁₀	0.15	0.70
26B	Stabilizer Storage Baghouse Stack	PM ₁₀	0.29	1.26
27	Stabilizer Heater Baghouse Stack	PM ₁₀	0.09	0.40
28	Asphalt Heater Vent	NO _x	0.59	2.60
		SO ₂	<0.01	0.02
		PM ₁₀	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	AIR CONTAMINANTS DATA	
			Emission Rates *	
			lb/hr	TPY**
30	Hot Oil Heater Vent (Thermal Fluid Heater)	NO _x	0.27	1.20
		SO ₂	<0.01	0.01
		PM ₁₀	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Plantwide Fugitive Emissions	VOC	0.43	1.88
		PM ₁₀	0.91	3.97
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	3.38	14.80
		PM ₁₀	6.00	26.30
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO _x	0.60	2.58
		SO ₂	<0.01	0.02
		PM ₁₀	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.

(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.

(3) NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - particulate matter, suspended in the atmosphere, including PM₁₀.

PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.

CO - carbon monoxide

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

(4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

** Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour
Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles
1,498,000 tons/year of finished shingles

SPECIAL CONDITIONS

Permit Number 7711A

EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. Total emissions from these sources shall not exceed the values stated on the enclosed table entitled "Emission Sources - Maximum Allowable Emission Rates." The permitted emission limits for all emission point numbers (EPNs) are based on 8,760 annual hours of operation.
2. The fuel for this facility shall be pipeline sweet natural gas as defined in Title 30 Texas Administrative Code Chapter 101 (30 TAC Chapter 101) containing no more than 5 grains total sulfur and 0.25 grain hydrogen sulfide per 100 dry standard cubic feet. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

FEDERAL APPLICABILITY

3. The holder of this permit shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subparts A and UU.

(Does Subpart UU now apply to both Line #1 as well as #3, although Line #1 was built before the Subpart UU effective date?)

OPACITY/VISIBLE EMISSION LIMITATIONS

4. As determined by a certified opacity observer with delegation from the Executive Director of the TCEQ and according to EPA Test Method (TM) 9 or equivalent, opacity of emissions from the Electrostatic Precipitator (EPN 34), all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period, except for those times described in 30 TAC §§ 101.201 and 101.211. There shall be no discharge into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent except for one consecutive period in any 24-hour period when the transfer lines are being blown for clearing.
5. As determined by a trained observer as delegated by the Executive Director of the TCEQ, except for emissions from any stack, no visible emissions from this facility operation, road, or travel area shall leave the property. Visible emissions shall be determined by the EPA TM 22 or equivalent.

SPECIAL CONDITIONS

Permit Number 7711A

Page 2

OPERATIONAL LIMITATIONS AND WORK PRACTICES

6. The holder of this permit shall ensure that:
 - A. All filler and backing material shall be received and transferred with no visible emissions leaving the building.
 - B. The emissions from blowing stills and in the following Stillyard Storage Tanks T-8, T-9, T-10, T-14, T-15, T-110, and T-120, containing asphalt, shall be vented to the Thermal oxidizer.
7. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
8. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible particulate matter (PM) emissions to maintain compliance with all TCEQ rules and regulations.

INITIAL DETERMINATION OF COMPLIANCE

9. Within 180 days after the issuance date of this permit, stack sampling of the Electrostatic Precipitator (EPN 34) and the Boiler/Thermal Oxidizer Vent (EPN 8) for PM, nitrogen oxides (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), and volatile organic compounds (VOC) emissions shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Also within 180 days after the issuance of this permit, stack sampling of the emissions from Line 1 cooling section (EPN COOL1) and Line 3 cooling section (COOL3) shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with any applicable requirements of 40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Austin Compliance Support Division.

SPECIAL CONDITIONS

Permit Number 7711A

Page 3

CONTINUOUS DETERMINATION OF COMPLIANCE

10. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions from EPNs listed in Special Condition No. 4 that exceed the opacity specified in Special Condition No. 4, the holder of this permit shall conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowables specified in the maximum allowable emission rates table. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual or in accordance with applicable EPA Code of Federal Regulations procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling.

SAMPLING REQUIREMENTS

11. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the TCEQ Sampling Procedures Manual, "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.
12. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their expense.
13. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for initial and/or continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during initial compliance testing, then the production/throughput rates or other parameter may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.
14. A pretest meeting concerning the required sampling and/or monitoring shall be held with personnel from TCEQ before the required tests are performed. Air contaminants to be tested for and test methods to be used shall be confirmed at this pretest meeting.
 - A. During a continuous compliance determination with Special Condition No. 10 stipulations, sampling shall occur within 60 days of the written notification of violation from the TCEQ.

SPECIAL CONDITIONS

Permit Number 7711A

Page 4

B. The TCEQ Regional Office shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

C. Air contaminants to be tested for include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.

D. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Dallas/Fort Worth Regional Office.

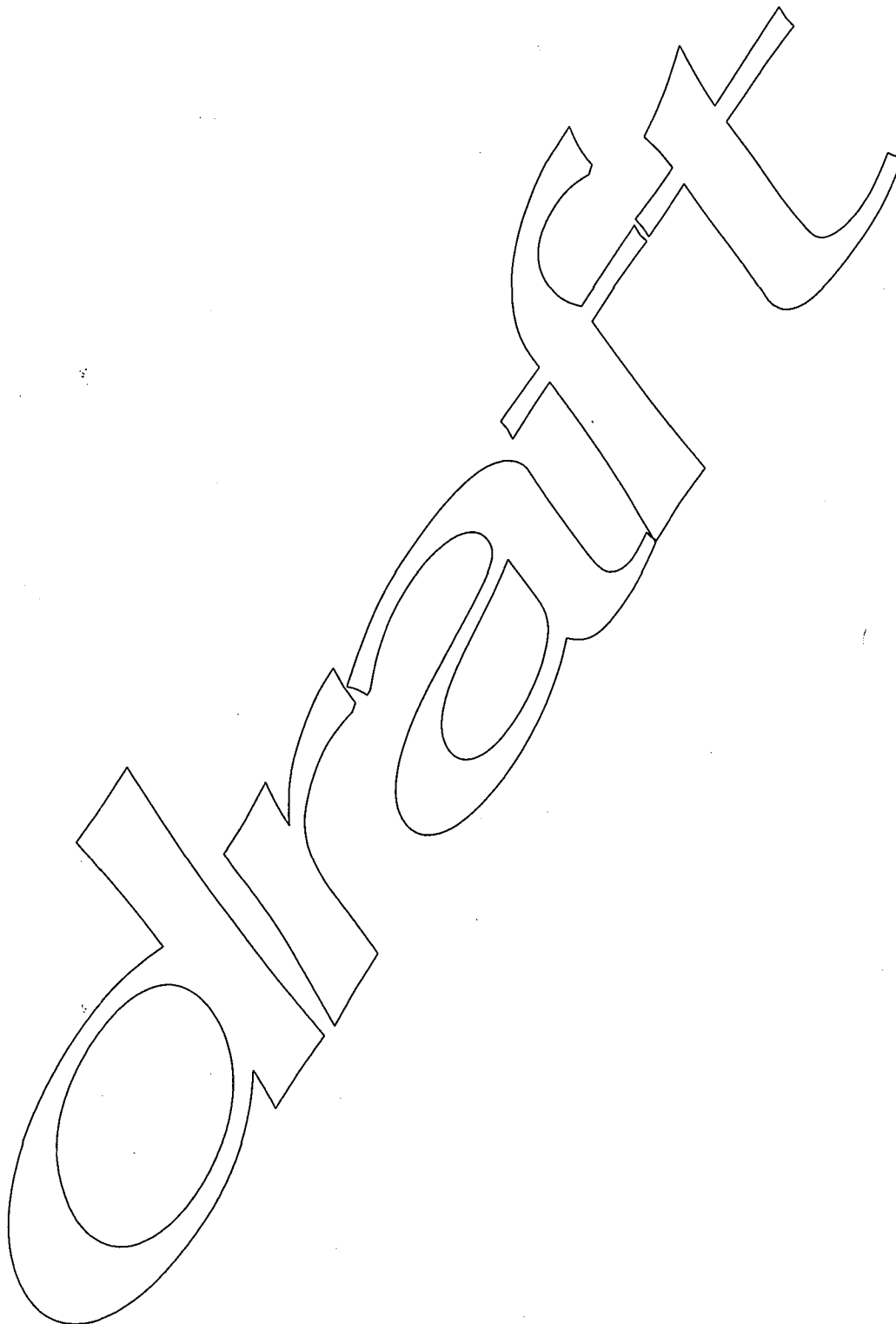
One copy to the TCEQ Austin Compliance Support Division.

15. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.
16. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division.

RECORDKEEPING REQUIREMENTS

17. Records shall be kept as specified in General Condition No. 7 and made available upon request to the TCEQ or any air pollution control program having jurisdiction.

SPECIAL CONDITIONS
Permit Number 7711A
Page 5



EPN 25	3.82 DIA	58' HI	5.46 #/HR	PM	65 FPS
EPN 26A	0.68	36	0.15	59 FPS	
14,900 ALPM EPN 26B	1.20	36	0.29	59 FPS	$\frac{TR^2 \times 60 \times FPS}{200} = \frac{50 \times 19,000}{200}$
EPN 27	1.47	116	0.09	35 FPS	
EPN 1-1	0.83	50	0.23	92 FPS	
EPN 1-3	0.83	55	0.03	92 FPS	
EPN 1-4	2.5	40	0.59	123 FPS	
EPN 1-5	2.5	40	0.59	92 FPS	
EPN 1-6	2.5	40	0.59	123 FPS	
EPN 34	3.11	35	3.20 ?	53 FPS	125° E
COOL 3	(3) 5.08	43	6.00	36 FPS	
COOL 1	(3) 5.08	43	1.20	36	

Earl Jones - Dallas - Dust Collection Enhancement Project

From: "Bright, Fred" <FBright@gaf.com>
To: <ejones@tnrcc.state.tx.us>
Date: 10/20/2003 7:59 AM
Subject: Dallas - Dust Collection Enhancement Project

Earl,

We have some current activity at the GAF Dallas Plant that may impact the current permitting efforts and I wanted you to be aware of this activity so you can evaluate how to address this work in your current efforts.

As a result of the unexpectedly high PM values found when stack testing was done on the cooling section exhaust stacks, we performed a review and determined that the shingle back-surfacing sand application needs some enhancements in order to address the sand fines that appear to become airborne and are exhausted by the high volume flow rate of the cooling fans.

Efforts are currently underway to design enhancements to the existing sand application dust control system. Once the design is complete, and we know what the enhancements will involve, we will be submitting a formal air permit application for this work. We would like to have everything completed to implement the necessary modifications during the year-end shutdown. But, realistically, we believe that the work probably won't be able to start until after January 1 and modifications will need to be performed during weekly maintenance shutdown days - which will extend the work into February.

After the modifications are complete, we will again perform a stack test for PM emissions and expect to see a significant reduction in the emission level.

Please let me know if you need any details on project for your current work.
Fred

PS - I may have mentioned this previously: the storage tank vent control project (ducting storage tank vents to the stillyard oxidizer) is complete and up and operating.

Earl Jones - Dallas - Dust Collection Enhancement Project

From: "Bright, Fred" <FBright@gaf.com>
To: <ejones@tnrcc.state.tx.us>
Date: 10/20/2003 7:59 AM
Subject: Dallas - Dust Collection Enhancement Project

Earl,

We have some current activity at the GAF Dallas Plant that may impact the current permitting efforts and I wanted you to be aware of this activity so you can evaluate how to address this work in your current efforts.

As a result of the unexpectedly high PM values found when stack testing was done on the cooling section exhaust stacks, we performed a review and determined that the shingle back-surfacing sand application needs some enhancements in order to address the sand fines that appear to become airborne and are exhausted by the high volume flow rate of the cooling fans.

Efforts are currently underway to design enhancements to the existing sand application dust control system. Once the design is complete, and we know what the enhancements will involve, we will be submitting a formal air permit application for this work. We would like to have everything completed to implement the necessary modifications during the year-end shutdown. But, realistically, we believe that the work probably won't be able to start until after January 1 and modifications will need to be performed during weekly maintenance shutdown days - which will extend the work into February.

After the modifications are complete, we will again perform a stack test for PM emissions and expect to see a significant reduction in the emission level.

Please let me know if you need any details on project for your current work.
Fred

PS - I may have mentioned this previously: the storage tank vent control project (ducting storage tank vents to the stillyard oxidizer) is complete and up and operating.

Earl Jones - RE: Dallas facility

From: "Bright, Fred" <FBright@gaf.com>
To: Earl Jones
Date: 9/4/03 11:20 AM
Subject: RE: Dallas facility

Hello Earl and welcome back.

Sorry to hear about your wife - I hope she is recovering and feels well.
 (This is a long email, but I wanted to cover everything that is pending.)

Regarding your questions:

- 1) Have we completed the test for the cooling emissions? (In a word, "No".)
 - a) As you know, we completed the initial cooling section stack test back in December. I had it reviewed by another stack test person who we have used in California and has experience with roofing plants. (He's now with TRC.) He had some concerns with the test results which I forwarded on June 6, 2003.
 - b) You sent these comments to Gary Goldman and he responded on June 10 basically commenting that, although he never received a copy of the stack test report, he had concluded the sampling was acceptable.
 - c) I mailed a copy of the report to Mr. Goldman on June 24, 2003 and asked that he contact me after he has reviewed the report. (My plan was to try and arrange a conference call with our consultant) I haven't heard from Mr. Goldman.
 - d) In continued preparation for another stack test, TRC visited the Dallas Plant on June 12 for a pre-test review and submitted comments on June 30, 2003.
 - e) Their comments raised one big issue that impacts the stack testing: they noted that the air draw from the roof exhaust fans is apparently greater than the dust collector draw at the sheet back-surface sand applicator (which is just before the sheet enters the cooling section). Therefore, very light fine sand appears to be pulled by the roof fans and exhausted via the cooling section - contributing to the high PM results in the stack test.
 - f) We are currently working to find a "material handling" consultant to design an upgrade to the existing sand applicator dust collection system. We have had a consultant who has done this work for GAF for years: JSG Technical. This company was fantastic and from the "old school". They would provide a detailed report with layout drawing and extensive pressure/flow calculations for the entire system they reviewed. (An example report is attached - it also included 3 - 24" x 30" dimensioned layout drawings; all done by hand.) I sadly discovered that apparently JSG has gone out of business. The owner retired and apparently no one bought the business. We are now struggling to find another company who can provide this level of design assistance. The plant has a meeting scheduled for Sept. 11th with a firm from Kansas City who may be comparable to JSG. (We hope.)
 - g) We also expect the modified sand application dust collection to significantly reduce the PM emissions from the cooling section.
 - h) Permitting will need to be done once the modifications are defined. Design and installation is probably 4-6 months away. How should this be handled with the current permit renewal?

<<JSG Report Example.pdf>>

- 2) Has Table 1(a) been completed for the entire Plant?
 - a) I sent the attached versions of Table 1(a) for Line 1 and 3 back in January before we agreed that the two Lines could be combined into a single permit.
 - b) Should the permit values be combined for a revised Table 1(a) set of values?
 - c) I note that these versions of Table 1(a) do not have values for the cooling section. I was awaiting the stack test results. I presume I should now incorporate the December stack test values?

<<TNRCC Table 1(a) Line 3 and Line 1 01-2003.doc>>

- 3) NEW ITEM for your input:
 - a) The plant is making preparations to add a dust collector. Two existing Stabilizer silos share a common dust collector that is mounted on top of one of the silos. For a long time, the plant has experienced problems pulling stabilizer from the silo with the dust collector mounted on top: bridging and binding of the material. The plant believes the problem is due to the fact that all the fine material captured by the dust collector drops into

the problem silo and nothing drops into the other silo, therefore no problems. The plant hopes that a separate dust collector on each silo will eliminate this problem.

b) We're probably 6-months away from having this new dust collector installed and operational. Should this be included in permit now or added later?

Fred

-----Original Message-----

From: Earl Jones [mailto:EJONES@tceq.state.tx.us]

Sent: Wednesday, September 03, 2003 4:36 PM

To: Bright, Fred

Subject: Dallas facility

Fred, I have been on a vacation which was extended because my wife fell and broke 5 ribs plus a punctured lung. I am back at work and need to finish the permit for your Dallas Plant.

Question number one: Have you completed the test for the cooling emissions?

Question number two: Have you completed a table 1(a) with emissions for the entire plant? This is needed to combine your permits into one permit without going to public notice.

Look forward to these answers soon. Thanks Earl

Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: [47 FR 34143, Aug. 6, 1982]

§ 60.470 Applicability and designation of affected facilities.

(a) The affected facilities to which this subpart applies are each saturator and each mineral handling and storage facility at asphalt roofing plants; and each asphalt storage tank and each blowing still at asphalt processing plants, petroleum refineries, and asphalt roofing plants.

(b) Any saturator or mineral handling and storage facility under paragraph (a) of this section that commences construction or modification after November 18, 1980, is subject to the requirements of this subpart. Any asphalt storage tank or blowing still that processes and/or stores asphalt used for roofing only or for roofing and other purposes, and that commences construction or modification after November 18, 1980, is subject to the requirements of this subpart. Any asphalt storage tank or blowing still that processes and/or stores only nonroofing asphalts and that commences construction or modification after May 26, 1981, is subject to the requirements of this subpart.

Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: [47 FR 34143, Aug. 6, 1982]

§ 60.471 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

Afterburner (A/B) means an exhaust gas incinerator used to control emissions of particulate matter.

Asphalt processing means the storage and blowing of asphalt.

Asphalt processing plant means a plant which blows asphalt for use in the manufacture of asphalt products.

Asphalt roofing plant means a plant which produces asphalt roofing products (shingles, roll roofing, siding, or saturated felt).

Asphalt storage tank means any tank used to store asphalt at asphalt roofing plants, petroleum refineries, and asphalt processing plants. Storage tanks containing cutback asphalts (asphalts diluted with solvents to reduce viscosity for low temperature applications) and emulsified asphalts (asphalts dispersed in water with an emulsifying agent) are not subject to this regulation.

Blowing still means the equipment in which air is blown through asphalt flux to change the softening point and penetration rate.

Catalyst means means a substance which, when added to asphalt flux in a blowing still, alters the penetrating-softening point relationship or increases the rate of oxidation of the flux.

Coating blow means the process in which air is blown through hot asphalt flux to produce coating asphalt. The coating blow starts when the air is turned on and stops when the air is turned off.

Electrostatic precipitator (ESP) means an air pollution control device in which solid or liquid particulates in a gas stream are charged as they pass through an electric field and precipitated on a collection surface.

High velocity air filter (HVAF) means an air pollution control filtration device for the removal of sticky, oily, or liquid aerosol particulate matter from exhaust gas streams.

Mineral handling and storage facility means the areas in asphalt roofing plants in which minerals are unloaded from a carrier, the conveyor transfer points between the carrier and the storage silos, and the storage silos.

Saturator means the equipment in which asphalt is applied to felt to make asphalt roofing products. The term saturator includes the saturator, wet looper, and coater.

Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: [47 FR 34143, Aug. 6, 1982]

§ 60.472 Standards for particulate matter.

(a) On and after the date on which §60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any saturator:

(1) Particulate matter in excess of: (i) 0.04 kilograms of particulate per megagram of asphalt shingle or mineral-surfaced roll roofing produced, or (ii) 0.4 kilograms per megagram of saturated felt or smooth-surfaced roll roofing produced;

(2) Exhaust gases with opacity greater than 20 percent; and

(3) Any visible emissions from a saturator capture system for more than 20 percent of any period of consecutive valid observations totaling 60 minutes. Saturators that were constructed before November 18, 1980, and that have not been reconstructed since that date and that become subject to these standards through modification are exempt from the visible emissions standard. Saturators that have been newly constructed or reconstructed since November 18, 1980 are subject to the visible emissions standard.

(b) On and after the date on which §60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any blowing still:

(1) Particulate matter in excess of 0.67 kilograms of particulate per megagram of asphalt charged to the still when a catalyst is added to the still; and

(2) Particulate matter in excess of 0.71 kilograms of particulate per megagram of asphalt charged to the still when a catalyst is added to the still and when No. 6 fuel oil is fired in the afterburner; and

(3) Particulate matter in excess of 0.60 kilograms of particulate per megagram of asphalt charged to the still during blowing without a catalyst; and

(4) Particulate matter in excess of 0.64 kilograms of particulate per megagram of asphalt charged to the still during blowing without a catalyst and when No. 6 fuel oil is fired in the afterburner; and

(5) Exhaust gases with an opacity greater than 0 percent unless an opacity limit for the blowing still when fuel oil is used to fire the afterburner has been established by the Administrator in accordance with the procedures in §60.474(g).

(c) Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank(s) are ducted to a control device for a saturator, the combined emissions shall meet the emission limit contained in paragraph (a) of this section during the time the saturator control device is operating. At any other time the asphalt storage tank(s) must meet the opacity limit specified above for storage tanks.

(d) Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any mineral handling and storage facility emissions with opacity greater than 1 percent.

Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: [47 FR 34143, Aug. 6, 1982]

§ 60.473 Monitoring of operations.

(a) The owner or operator subject to the provisions of this subpart, and using either an electrostatic precipitator or a high velocity air filter to meet the emission limit in §60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature of the gas at the inlet of the control device. The temperature monitoring instrument shall have an accuracy of $\pm 15^{\circ}\text{C}$ over its range.

(b) The owner or operator subject to the provisions of this subpart and using an afterburner to meet the emission limit in §60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of $\pm 10^{\circ}\text{C}$ over its range.

(c) An owner or operator subject to the provisions of this subpart and using a control device not mentioned in paragraphs (a) and (b) of this section shall provide to the Administrator information describing the operation of the control device and the process parameter(s) which would indicate proper operation and maintenance of the device. The Administrator may require continuous monitoring and will determine the process parameters to be monitored.

(d) The industry is exempted from the quarterly reports required under §60.7(c). The owner/operator is required to record and report the operating temperature of the control device during the performance test and, as required by §60.7(d), maintain a file of the temperature monitoring results for at least two years.

Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: [54 FR 6677, Feb. 14, 1989, as amended 54 FR 27016, June 27, 1989]

§ 60.474 Test methods and procedures.

(a) For saturators, the owner or operator shall conduct performance tests required in §60.8 as follows:

(1) If the final product is shingle or mineral-surfaced roll roofing, the tests shall be conducted while 106.6-kg (235-lb) shingle is being produced.

(2) If the final product is saturated felt or smooth-surfaced roll roofing, the tests shall be conducted while 6.8-kg (15-lb) felt is being produced.

(3) If the final product is fiberglass shingle, the test shall be conducted while a nominal 100-kg (220-lb) shingle is being produced.

(b) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).

(c) The owner or operator shall determine compliance with the particulate matter standards in §60.472 as follows:

(1) The emission rate (E) of particulate matter shall be computed for each run using the following equation:

$$E=(c_s Q_{sd})/(PK)$$

where:

E=emission rate of particulate matter, kg/Mg.

c_s =concentration of particulate matter, g/dscm(g/dscf).

Q_{sd} =volumetric flow rate of effluent gas, dscm/hr (dscf/hr).

P=asphalt roofing production rate or asphalt charging rate, Mg/hr (ton/hr).

K=conversion factor, 1000 g/kg [907.2/(g-Mg)/(kg-ton)].

(2) Method 5A shall be used to determine the particulate matter concentration (c_p) and volumetric flow rate (Q_{sd}) of the effluent gas. For a saturator, the sampling time and sample volume for each run shall be at least 120 minutes and 3.00 dscm (106 dscf), and for the blowing still, at least 90 minutes or the duration of the coating blow or non-coating blow, whichever is greater, and 2.25 dscm (79.4 dscf).

(3) For the saturator, the asphalt roofing production rate (P) for each run shall be determined as follows: The amount of asphalt roofing produced on the shingle or saturated felt process lines shall be obtained by direct measurement. The asphalt roofing production rate is the amount produced divided by the time taken for the run.

(4) For the blowing still, the asphalt charging rate (P) shall be computed for each run using the following equation:

$$P = (Vd) / (K' t)$$

where:

P=asphalt charging rate to blowing still, Mg/hr (ton/hr).

V=volume of asphalt charged, m^3 (ft^3).

d=density of asphalt, kg/m^3 (lb/ft^3).

K'=conversion factor, 1000 kg/Mg (2000 lb/ton).

t=duration of test run, hr.

(i) The volume (V) of asphalt charged shall be measured by any means accurate to within 10 percent.

(ii) The density (d) of the asphalt shall be computed using the following equation:

$$d = K'' (1056.1 - 0.6176 \text{ } ^\circ\text{C})$$

where:

$^\circ\text{C}$ =temperature at the start of the blow, $^\circ\text{C}$.

$K'' = 1.0 [0.06243 \text{ (lb-m}^3\text{)/(ft}^3\text{-kg)}]$.

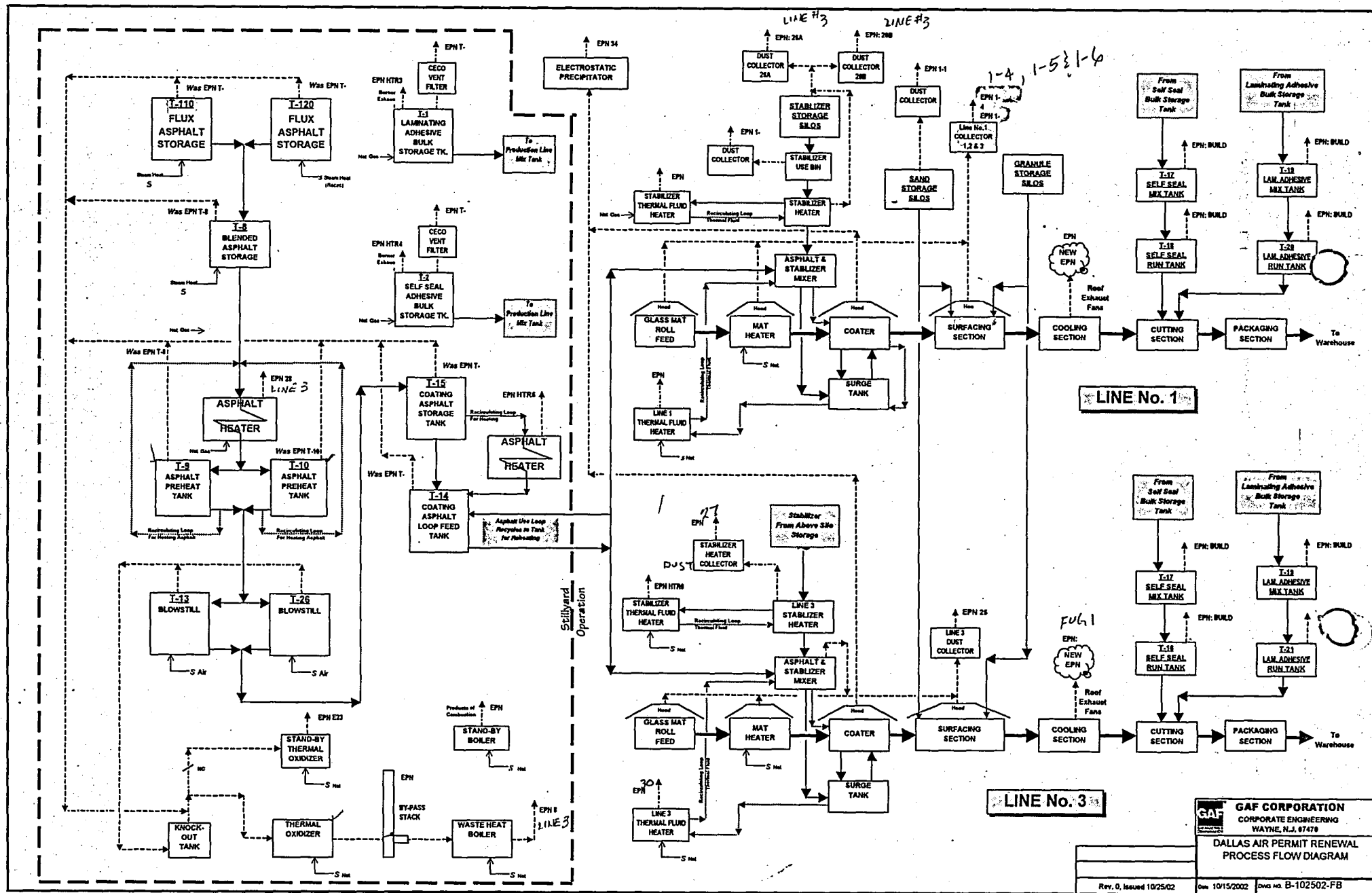
(5) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(d) The Administrator will determine compliance with the standards in §60.472(a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with §60.8(c)) totaling 60 minutes. A performance test shall consist of one run.

(e) The owner or operator shall use the monitoring device in §60.473 (a) or (b) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results.

(f) If at a later date the owner or operator believes the emission limits in §60.472 (a) and (b) are being met even though the temperature measured in accordance with §60.473 (a) and (b) is exceeding that measured during the performance test, he may submit a written request to the Administrator to repeat the performance test and procedure outlined in paragraph (c) of this section.

(g) If fuel oil is to be used to fire an afterburner used to control emissions from a blowing still, the owner or operator may petition the Administrator in accordance with §60.11(e) of the General Provisions to establish an opacity standard for the blowing still that will be the opacity standard when fuel oil is used to fire the afterburner. To obtain this opacity standard, the owner or operator must request the Administrator to determine opacity during an initial, or subsequent, performance test when fuel oil is used to fire the afterburner. Upon receipt of the results of the performance test, the Administrator will make a finding concerning compliance with the mass standard for the blowing still. If the Administrator finds that the facility was in compliance with the mass standard during the performance test but failed to meet the zero opacity standard, the Administrator will establish and promulgate in the Federal Register an opacity standard for the blowing still that will be the opacity standard when fuel oil is used to fire the afterburner. When the afterburner is fired with natural gas, the zero percent opacity remains the applicable opacity standard.



EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number: 48785

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA					
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		COMMENTS
			lb/hr	TPY**	
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM ₁₀	0.23	1.01	
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM ₁₀	0.03	0.13	
22 HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO _x	0.20	0.86	2.0 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	0.02	0.07	
		CO	0.17	0.72	
		VOC	0.01	0.05	
1-4	Line 1 Surfacing Section Dust Collector No.1 Stack	PM ₁₀	0.59	2.58	
1-5	Line 1 Surfacing Section Dust Collector No.2 Stack	PM ₁₀	0.59	2.58	
1-6	Line 1 Surfacing Section Dust Collector No.3 Stack	PM ₁₀	0.90 0.59	2.58	
34	Line #1 Electrostatic Precipitator Stack	VOC	0.90	3.94 ? (ok)	
		PM ₁₀	2.03	8.89 ? (ok)	
22 HTR2	Line 1 Thermal Fluid Heater	NO _x	0.20	0.86	2.0 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	0.02	0.07	
		CO	0.17	0.72	
		VOC	0.01	0.05	
EUG2 COOL1 (total 3 stks)	Fugitive Fumes from Asphalt Coater Line #1 Cooling Section Stacks	VOC	2.02	8.85	
		PM ₁₀	??	??	
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22	0.5mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	<0.01	0.02	
		CO	0.04	0.18	
		VOC	<0.01	0.01	
T-2 T-9	T-1 Laminating Adhesive Bulk Storage Tank CECO Filter Vent	PM ₁₀	<0.01	0.02	(EPN from 2001 Emission Inventory Report)
		VOC	0.03	0.17	
HTR4	T-2 Self Seal Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22	0.5mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	<0.01	0.02	
		CO	0.04	0.18	
		VOC	<0.01	0.01	

Permit No. 48785

Page 2

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		COMMENTS
			lb/hr	TPY**	
T-2 T-9	T-1 Laminating Adhesive Bulk	PM ₁₀	<0.01	0.02	(EPN from 2001 Emission Inventory Report)
	Storage Tank CECO Filter Vent	VOC	0.03	0.17	
HTR5	Asphalt Heater for T-14 and T-15	NO _x	0.10	0.43	1.0 mmbtu/hr
	Coating Asphalt Storage Tank and	SO ₂	<0.01	<0.01	
	Coating Asphalt Loop Feed Tank	PM ₁₀	0.01	0.03	
	Asphalt Preheater (for Blowstill)	CO	0.08	0.36	
		VOC	0.01	0.02	
22 BLR5	Stand-By Boiler Vent	NO _x	3.73	16.34	38.0 mmbtu/hr
		SO ₂	0.02	0.09	
		PM ₁₀	0.28	1.23	
		CO	3.13	13.71	
		VOC	0.21	0.92	
23	Stand-By Thermal Oxidizer Vent	NO _x			
		SO ₂			
		PM ₁₀			
		CO			
		VOC			
22 8A	Thermal Oxidizer/Waste Heat Boiler By-Pass Stack	NO _x			
		SO ₂			
		PM ₁₀			
		CO			
		VOC			
FUG3	<u>Line 1 Building Fugitives</u> [All fugitives (both lines) included with FUG1] (See following item)	PM			
FUG1	Plant Wide Fugitives	PM ₁₀	0.91	3.97	(From April 2001 Emission Inventory)
		VOC	0.43	1.88	
??	Line 1 Mat Preheater IR Burners Vent (20 @ 60,000 btu/hr each)	NO _x	0.12	0.52	1.2 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	0.01	0.04	
		CO	0.10	0.43	
		VOC	0.01	0.03	

Permit No. 48785

Page 3

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in 30 Texas Administrative Code Section 101.1
 - IOC-U - inorganic compounds (unspeciated)
 - NO_x - total oxides of nitrogen
 - SO₂ - sulfur dioxide
 - PM - particulate matter, suspended in the atmosphere, including PM₁₀.
 - PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
 - CO - carbon monoxide
 - HCl - hydrogen chloride
 - HF - hydrogen fluoride
 - HBr - hydrogen bromide
 - HI - hydrogen iodide
 - NaOH - sodium hydroxide
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number: 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA					
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		COMMENTS
			lb/hr	TPY**	
25	Sand Application Baghouse Stack	PM ₁₀	5.46	23.9	
26A	Stabilizer Storage Baghouse Stack	PM ₁₀	0.13	0.55	
27	Stabilizer Heater Baghouse Stack	PM ₁₀	0.09	0.40	
28	Asphalt Heater Vent	NOx	0.59	2.60	6.0 mmbtu/hr
		SO ₂	<0.01	0.02	
		PM ₁₀	0.04 0.05	0.20 0.22	
		CO	0.50	2.20	
		VOC	0.03	0.10 0.13	
30	Line #3 Hot Oil Heater Vent (thermal fluid heater)?? (YES)	NOx	0.27	1.20	2.7 mmbtu/hr
		SO ₂	<0.01	0.01	
		PM ₁₀	0.02	0.10	
		CO	0.23	1.00	
		VOC	0.01 0.02	0.04 0.06	
34	Line #3 Electrostatic Precipitator Stack	VOC	2.30? (ok)	11.00? (ok)	
		PM ₁₀	1.24? 1.40	5.40? 6.13	
FUG2 COOL3 (total 3 stks)	Fugitive Fumes from Asphalt Coater Line #3 Cooling Section Stacks	VOC	2.02	8.85 <u>2.03</u> 10.88	
		PM ₁₀	??	??	
8	Thermal Oxidizer with Waste Heat Boiler Vent	NOx	1.75	7.7	16.0 mmbtu/hr (plus combustion of asphalt fumes)
		SO ₂	0.73	3.2	
		PM ₁₀	0.16	0.70	
		CO	1.28	5.60	
		VOC	0.09	0.40	
98	Rail 2 Stack	PM ₁₀	4.63	4.59	
		VOC	0.51	0.51	
22 BLR5	#5 Boiler Vent Stack (Stand-Alone Boiler)	NOx	1.90 3.75-	8.32 16.32	38.0 mmbtu/hr
		SO ₂	0.01 0.02	0.05 0.10	
		PM ₁₀	0.14 0.28	0.63 1.24	
		CO	1.60 3.03	6.90 13.71	
		VOC	0.10 0.21-	0.46 0.90	

Permit No. 7711A
Page 2

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

<u>Emission Point No. (1)</u>	<u>Source Name (2)</u>	<u>Air Contaminant Name (3)</u>	<u>Emission Rates *</u>		
			<u>lb/hr</u>	<u>TPY**</u>	
22 8	#4 Boiler - North Amer. Series 4384-12 Vent Oxidizer with Waste Heat Boiler Boiler Aux. Burner Vent	NOx	1.50	6.57	15.0 mmbtu/hr
		SO ₂	0.01	0.04	
		PM ₁₀	0.11	0.50	
		CO	1.26	5.52	
		VOC	0.08	0.36	
22 HTR6	Menestrina Oil Heater Vent	NOx	0.60	2.63	6.0 mmbtu/hr
		SO ₂	<0.01	0.02	
		PM ₁₀	0.05	0.20	
		CO	0.50	2.21	
		VOC	0.03	0.14	
23	Inferno Therm Oil Heater Heater Mod 300 Vent	NOx	0.17	0.74	1.7 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	0.01	0.06	
		CO	0.14	0.63	
		VOC	0.01	0.04	
??	Mat Fume Burner Vent Line 3 Mat Preheater IR Burners Vent (24 @ 60,000btu/hr each)	NOx	0.07	0.32	1.44 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	<0.01	0.02	
		CO	0.06	0.26	
		VOC	<0.01	0.22	
??	Self Seal Mix Tank Burner Vent	NOx	0.05	0.22	0.5 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	<0.01	0.02	
		CO	0.04	0.18	
		VOC	<0.01	0.01	
??	TLA Run Tank Burner Vent	NOx	0.05	0.22	0.5 mmbtu/hr
		SO ₂	<0.01	<0.01	
		PM ₁₀	<0.01	0.02	
		CO	0.04	0.18	
		VOC	<0.01	0.01	
??	Asphalt Coating Heater Vent	NOx	0.30	1.31	mmbtu/hr
		SO ₂	<0.01	0.01	
		PM ₁₀	0.02	0.10	
		CO	0.25	1.1	
		VOC	0.02	0.07	

Permit No. 7711A

Page 3

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) VOC- volatile organic compounds as defined in 30 Texas Administrative Code Section 101.1
IOC-U- inorganic compounds (unspeciated)
NO_x - total oxides of nitrogen
SO₂ - sulfur dioxide
PM - particulate matter, suspended in the atmosphere, including PM₁₀.
PM₁₀- particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
CO - carbon monoxide
HCl - hydrogen chloride
HF - hydrogen fluoride
HBr - hydrogen bromide
HI - hydrogen iodide
NaOH - sodium hydroxide
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

8800 EAST 63RD ST.
KANSAS CITY, MO 64133
816-356-8400
FAX: 816-353-1873
SALES: 800-821-2222

ENGINEERING
DESIGN SHEET



Project: _____ Project No: _____
Prep. By: _____ Subj: _____ Date: _____

WHAT & WHERE

• EPN T-80 ASPHALT FLUX TANK T-80

EPN DIESEL TANK T-80 35 MILLION GAL/YR

EPN E59 SAND-STORAGE DUST COLLECT 1000 CFM

EPN 8 WHAT IS CFM (4000) 5300 CFM @ 200°F
WHAT IS CONTROL EFFICIENCY

THERMAL OXIDIZER

EPN 34 ESP 24,000 CFM
TEST

FUGI BALLA PLANT $PM_{10} = 3.97 \text{ TPY}$ 82.2%
 $VOC = 2.85 \text{ TPY}$ OF MAX
POTENTIAL

HTR3 IDLE

~~EPN 30 (HTR3?)~~
~~ONE HTR (LINE 3)~~ ?

HTR6 EI > TBL 1(a)

26A 1285 CFM 0.26 TPY PM_{10} ?

26B 3414 CFM 1.5 EI TPY PM_{10} ? 1.26 TBL (a)

1-4 SOILFACE SECT. BGHSF 36,000 CFM TEST
 1-5 " " BGHSF 27,000 CFM TEST

~~WELL T-16 LINE #3 STEEL USE TANK~~

15,750 M
 95%
 W.C. 0.23
 0% = 4.6
 T-15 = 0.23 T-16
 350 M
 0% VOC = 0.0013
 SHOULD BE 0.102 T-16 0.124

T-17
 T-18
 T-19
 T-20
 T-21

T-9 ?

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number: 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	<u>Emission Rates *</u>	
			lb/hr	TPY**

STILLYARD OPERATION

PP HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 & T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17 ^{ET} .49X2
		PM ₁₀	0.01	0.02
PP HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
PP HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO _x	0.10	0.43
		SO ₂	0.01	0.01
		PM ₁₀	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
PP 28	T-15 Coating Asphalt Storage Tank & T-14 Coating Asphalt Storage Tank Nat. Gas Asphalt Heater Vent	NO _x	0.59	2.60
		SO ₂	<0.01	0.02
		PM ₁₀	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10
PP BLR5	Stand-By Boiler Vent	NO _x	3.73	16.34
		SO ₂	0.02	0.09
		PM ₁₀	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
PP 1-6	Line 1 (Surfacing Section) Dust Collector Stack #3	PM ₁₀	0.59	2.58
PP HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO _x	0.20	0.86
		SO ₂	0.01	0.01
		PM ₁₀	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
PP HTR2	Line 1 Thermal Fluid Heater Vent	NO _x	0.20	0.86
		SO ₂	0.01	0.01
		PM ₁₀	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
	T-20 LAM ADHESIVE MIX TANK			
COOL1(total 3 stks)	Fumes from Asphalt Coater	VOC	2.22	9.73
T-80	TANK ?	PM ₁₀	8.11	35.54
Build BLDG	T-18 Self-Seal Mix Tank	??	??	??
Build BLDG	T-20 Self-Seal Mix Tank	??	??	??
T-18	TANK ?			
FUG 3 ¹	Plant Wode Building Fugitives(4)	VOC	0.43	2.85 ET 1.88
		PM ₁₀	0.91	3.97
LINE 3 OPERATION			3.86?	
PP 25	Sand Application Baghouse Stack	PM ₁₀	5.46	23.9
PP 26A	Stabilizer Storage Baghouse Stack	PM ₁₀	0.15	0.70
PP 26B?????	Stabilizer Storage Baghouse Stack	PM ₁₀	0.29	1.26 1.5 ET
PP 27	Stabilizer Heater Baghouse Stack	PM ₁₀	0.09	0.40

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
23 ?	Stand-By Thermal Oxidizer Vent	?		
PP 8	Boiler and Thermal Oxidizer Vent	NO _x	1.75	7.70
		SO ₂	0.73	3.20
		PM ₁₀	0.16	0.70
		CO	1.28	5.60
		VOC	0.09	0.40
??	Thermal Oxidizer/Waste Heat Boiler By-Pass Stack	?		

COMMON TO LINE 1 AND LINE 3

PP 34	Electrostatic Precipitator (for Line 1 & 3) Stack	VOC	3.20	14.94
		PM ₁₀	3.27	14.29
98	Rail 2 Stack	PM ₁₀	4.63	4.59
		VOC	0.51	0.51

LINE No. 1 OPERATION

PP 1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM ₁₀	0.23	1.01
PP 1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM ₁₀	0.03	0.13
1-2	Line 1 Stabilizer Thermal Fluid Heater Vent	?		
PP 1-4	TEST Line 1 (Surfacing Section) Dust Collector Stack #1 36,000 CFM	PM ₁₀	0.59	2.58
PP 1-5	TEST Line 1 (Surfacing Section) Dust Collector Stack #2 27,000 ACFM	PM ₁₀	0.59	2.58

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
PP 28	Asphalt Heater Vent	NO _x	0.59	2.60
		SO ₂	<0.01	0.02
		PM ₁₀	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10
30	Oil Heater Vent (thermal fluid heater) ??	NO _x	0.27	1.20
		SO ₂	<0.01	0.01
		PM ₁₀	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Fugitive Fumes from Line 3 Cooling Section	VOC	2.02	8.85
		PM ₁₀	??	??
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	3.38	14.80
		PM ₁₀	12.12	53.10
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO _x	0.20	0.86
		SO ₂	0.01	0.01
		PM ₁₀	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
Build	T-16 Self-Seal Mix Tank	??	??	??
Build	T-17 Self-Seal Mix Tank	??	??	??
Build	T-19 Self-Seal Mix Tank	??	??	??
Build	T-21 Self-Seal Mix Tank	??	??	??

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
 (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
 (3) VOC - volatile organic compounds as defined in 30 Texas Administrative Code Section 101.1
 IOC-U - inorganic compounds (unspeciated)

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
NO _x	- total oxides of nitrogen			
SO ₂	- sulfur dioxide			
PM	- particulate matter, suspended in the atmosphere, including PM ₁₀ .			
PM ₁₀	- particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.			
CO	- carbon monoxide			
HCl	- hydrogen chloride			
HF	- hydrogen fluoride			
HBr	- hydrogen bromide			
HI	- hydrogen iodide			
NaOH	- sodium hydroxide			

(4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

FIN = FACILITY IDENTIFICATION NUMBER

TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side

EPN																		
FIN																		
EPN																		
FIN																		

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet.
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side.

PAGE 3 OF 3
DATE 01/06/2003

[illegible]

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet.
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side

DALLAS - Preliminary Permit Emission Summary (for discussion)

Rev. 1: 09-08-2003

SOURCE	PM/PM ₁₀		NOx		SO ₂		CO		VOC
Line #3 Equipment	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr
Sand Application Baghouse	5.46	23.90	---	---	---	---	---	---	---
Stabilizer Storage Baghouse A & B	0.15	0.70	---	---	---	---	---	---	---
Stabilizer Heater Baghouse	0.09	0.40	---	---	---	---	---	---	---
Asphalt Heater	0.04	0.20	0.59	2.60	0.004	0.02	0.50	2.20	0.03
Hot Oil Heater	0.02	0.10	0.27	1.20	0.002	0.01	0.23	1.00	0.01
ESP	1.24	5.40	---	---	---	---	---	---	2.30
Boiler & Thermal Oxidizer	0.16	0.70	1.75	7.70	0.73	3.20	1.28	5.60	0.05
Fugitive Fumes from Asph. Coater	---	---	---	---	---	---	---	---	2.02
Line 3 Cooling Section	12.12	53.10	---	---	---	---	---	---	3.38
Line 3 TOTAL =		84.50		11.50		3.23		8.80	
Line #1 Equipment (being added)									
Line 1 Stabilizer Storage and Heater Baghouse Stk	0.23	1.01	---	---	---	---	---	---	---
Line 1 Stabilizer Use Bin Baghouse Stk	0.03	0.13	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.1 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.2 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.3 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Stabilizer Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01
Line 1 Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01
ESP	2.03	8.89	---	---	---	---	---	---	0.90
Stand-by Boiler	0.28	1.23	3.73	16.34	0.02	0.09	3.13	13.71	0.21
Plant Wide Fugitives	0.91	3.97	---	---	---	---	---	---	0.43
T-1 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01
T-2 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01
T-1 & T-2 Laminating Adhesive Tank CECO Filter	0.01	0.02	---	---	---	---	---	---	0.03
Asphalt Heater for T-14 & T-15 Coating Storage	0.01	0.03	0.10	0.43	0.01	0.01	0.08	0.36	0.01
Line 1 Cooling Section	8.11	35.54	---	---	---	---	---	---	2.22
Line 1 TOTAL =		58.74		18.93		0.14		15.87	
Plant Total =		143.24		30.43		3.37		24.67	

DALLAS - Preliminary Permit Emission Summary (for discussion)

Rev. 1: 09-08-2003

SOURCE	PM/PM ₁₀		NOx		SO ₂		CO		VOC
Line #3 Equipment	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr
Sand Application Baghouse	5.46	23.90	---	---	---	---	---	---	---
Stabilizer Storage Baghouse A & B	0.15	0.70	---	---	---	---	---	---	---
Stabilizer Heater Baghouse	0.09	0.40	---	---	---	---	---	---	---
Asphalt Heater	0.04	0.20	0.59	2.60	0.004	0.02	0.50	2.20	0.03
Hot Oil Heater	0.02	0.10	0.27	1.20	0.002	0.01	0.23	1.00	0.01
ESP	1.24	5.40	---	---	---	---	---	---	2.30
Boiler & Thermal Oxidizer	0.16	0.70	1.75	7.70	0.73	3.20	1.28	5.60	0.05
Fugitive Fumes from Asph. Coater	---	---	---	---	---	---	---	---	2.02
Line 3 Cooling Section	12.12	53.10	---	---	---	---	---	---	3.36
Line 3 TOTAL =		84.50		11.50		3.23		8.80	
Line #1 Equipment (being added)									
Line 1 Stabilizer Storage and Heater Baghouse Stk	0.23	1.01	---	---	---	---	---	---	---
Line 1 Stabilizer Use Bin Baghouse Stk	0.03	0.13	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.1 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.2 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.3 Stk	0.59	2.58	---	---	---	---	---	---	---
Line 1 Stabilizer Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01
Line 1 Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01
ESP	2.03	8.89	---	---	---	---	---	---	0.90
Stand-by Boiler	0.28	1.23	3.73	16.34	0.02	0.09	3.13	13.71	0.21
Plant Wide Fugitives	0.91	3.97	---	---	---	---	---	---	0.43
T-1 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01
T-2 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01
T-1 & T-2 Laminating Adhesive Tank CECO Filter	0.01	0.02	---	---	---	---	---	---	0.03
Asphalt Heater for T-14 & T-15 Coating Storage	0.01	0.03	0.10	0.43	0.01	0.01	0.08	0.36	0.01
Line 1 Cooling Section	8.11	35.54	---	---	---	---	---	---	2.22
Line 1 TOTAL =		58.74		18.93		0.14		15.87	
Plant Total =		143.24		30.43		3.37		24.67	

DALLAS - Preliminary Permit Emission Summary (for discussion)

Rev. 1: 09-08-2003

SOURCE	PM/PM ₁₀		NO _x		SO ₂		CO		VOC	
Line #3 Equipment	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Sand Application Baghouse	5.46	23.90	---	---	---	---	---	---	---	---
Stabilizer Storage Baghouse A & B	0.15	0.70	---	---	---	---	---	---	---	---
Stabilizer Heater Baghouse	0.09	0.40	---	---	---	---	---	---	---	---
Asphalt Heater	0.04	0.20	0.59	2.60	0.004	0.02	0.50	2.20	0.03	0.10
Hot Oil Heater	0.02	0.10	0.27	1.20	0.002	0.01	0.23	1.00	0.01	0.04
ESP	1.24	5.40	---	---	---	---	---	---	2.30	11.00
Boiler & Thermal Oxidizer	0.16	0.70	1.75	7.70	0.73	3.20	1.28	5.60	0.09	0.40
Fugitive Fumes from Asph. Coater	---	---	---	---	---	---	---	---	2.02	8.85
Line 3 Cooling Section	12.12	53.10	---	---	---	---	---	---	3.38	14.80
Line 3 TOTAL =		84.50		11.50		3.23		8.80		20.39
Line #1 Equipment (being added)										
Line 1 Stabilizer Storage and Heater Baghouse Stk	0.23	1.01	---	---	---	---	---	---	---	---
Line 1 Stabilizer Use Bin Baghouse Stk	0.03	0.13	---	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.1 Stk	0.59	2.58	---	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.2 Stk	0.59	2.58	---	---	---	---	---	---	---	---
Line 1 Surfacing Section Collector No.3 Stk	0.59	2.58	---	---	---	---	---	---	---	---
Line 1 Stabilizer Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01	0.05
Line 1 Thermal Fluid Heater Vent	0.02	0.07	0.20	0.86	0.01	0.01	0.17	0.72	0.01	0.05
ESP	2.03	8.89	---	---	---	---	---	---	0.90	3.94
Stand-by Boiler	0.28	1.23	3.73	16.34	0.02	0.09	3.13	13.71	0.21	0.92
Plant Wide Fugitives	0.91	3.97	---	---	---	---	---	---	0.43	1.88
T-1 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01	0.01
T-2 Laminating Adhesive Tank Heater	0.01	0.02	0.05	0.22	0.01	0.01	0.04	0.18	0.01	0.01
T-1 & T-2 Laminating Adhesive Tank CECO Filter	0.01	0.02	---	---	---	---	---	---	0.03	0.17
Asphalt Heater for T-14 & T-15 Coating Storage	0.01	0.03	0.10	0.43	0.01	0.01	0.08	0.36	0.01	0.02
Line 1 Cooling Section	8.11	35.54	---	---	---	---	---	---	2.22	9.73
Line 1 TOTAL =		58.74		18.93		0.14		15.87		16.78
Plant Total =		143.24		30.43		3.37		24.67		37.17

PRELIMINARY

 PERMIT NO. _____ PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. DB-0378-S

 TABLE 1(a)
EMISSION SOURCES

 PAGE 1 OF 3
DATE 09/08/2003

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS												
EMISSION POINT		CONTAMINANT OR USE	AIR		LOCATION			SOURCE									
NUMBER	NAME		#/HR [3]	TONS/ YR [4]	ZONE	EAST [meters]	NORTH [meters]	HEIGHT	HEIGHT	STACK EXIT DATA			FUGITIVES				
										DIA. [ft.] [6(B)]	VEL. [ft/s] [6(C)]	TEMP. [°F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]	
LINE No. 3 EQUIPMENT and DETAILS																	
EPN 25	Sand Application	PM/PM ₁₀	5.46	23.9	14	700,00	3,628,600	58			3.82	65	100	N/A	N/A		
FIN 25																	
EPN 26	Stabilizer Storage	PM/PM ₁₀	0.15	0.7	14	700,03	3,628,620	36			0.68	59	Amb.	N/A	N/A		
FIN 26																	
EPN 27	Stabilizer Heater	PM/PM ₁₀	0.09	0.4	14	700,03	3,628,610	116			1.47	35	200	N/A	N/A		
FIN 27																	
EPN 28	Asphalt Heater	NO _x	0.59	2.6	14	700,03	3,628,630	30			2.82	30	570	N/A	N/A		
FIN 28		SO ₂	0.004	0.02													
		PM/PM ₁₀	0.04	0.2													
		CO	0.50	2.2													
		VOC	0.03	0.1													
EPN 30	Oil Heater	NO _x	0.27	1.2	14	700,03	3,628,610	8			0.8	30	700	N/A	N/A		
FIN 30		SO ₂	0.002	0.01													
		PM/PM ₁₀	0.02	0.1													
		CO	0.23	1.0													
		VOC	0.01	0.04													
EPN 34	ESP	VOC	2.30	11.0	14	700,03	3,628,610	35			3.11	53	125	N/A	N/A		
FIN 34		PM/PM ₁₀	1.24	5.4													
EPN 8	Boiler and Thermal Oxidizer	NO _x	1.75	7.7	14	700,00	3,628,600	10			2.5	18	200	N/A	N/A		

PRELIMINARY

FIN 8		SO ₂	0.73	3.2															
		PM/PM ₁₀	0.16	0.7															
		CO	1.28	5.6															
		VOC	0.09	0.4															
EPN FUG1	Fugitive Fumes from	VOC	2.02	8.85	14	700,14	3,628,519	33		4.5	18	100	N/A	N/A					
FIN FUG1																			
EPN COOL3	Line 3 Cooling Section	VOC	3.38	14.80	14	700,13	3,628,335	43		5.08	36	80	N/A	N/A					
FIN COOL3		PM/PM ₁₀	12.12	53.10															
EPN																			
FIN																			
EPN																			
FIN																			
EPN																			
FIN																			

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet.
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side

PERMIT NO. PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. DB-0378-S

TABLE 1(a)
EMISSION SOURCES

PAGE 2 OF 3
DATE 09/08/2003

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

[illegible]

PRELIMINARY

		PM/PM ₁₀	0.02	0.07													
		CO	0.17	0.72													
		VOC	0.01	0.05													
EPN 34	ESP	VOC	0.90	3.94	14	700,036	3,628,610	35		3.11	53	125	N/A	N/A			
FIN 34		PM/PM ₁₀	2.03	8.89													
EPN BLR5	Stand-by Boiler Vent	NO _x	3.73	16.34	14	700,189	3,628,398	60		4.0	50	1000	N/A	N/A			
FIN BLR5		SO ₂	0.02	0.09													
		PM/PM ₁₀	0.28	1.23													
		CO	3.13	13.71													
		VOC	0.21	0.92													
	Line 1 Cooling Section	VOC	2.22	9.73	14	700,23	3,628,552	43		5.08	36	80	N/A	N/A			
FIN COOL1		PM/PM ₁₀	8.11	35.54													
EPN FUG1	Plant Wide Fugitives	VOC	0.43	1.88	14	700,12	3,628,450	N/A		N/A	N/A	N/A	1050	800	20	55	
FIN FUG1		PM/PM ₁₀	0.91	3.97													
EPN																	
FIN																	
EPN																	
FIN																	

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet.
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side.

PRELIMINARY

00PERMIT NO. _____ PERMIT TYPE: CONSTRUCTION [] AMENDMENT [] ALTERATION [] RENEWAL [X]

ACCOUNT ID NO. DB-0378-S

 TABLE 1(a)
EMISSION SOURCES

 PAGE 3 OF 3
DATE 09/08/2003

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS													
EMISSION POINT			AIR					SOURCE										
NUMBER	NAME		#/HR [3]	TONS/ YR [4]	ZONE	EAST [meters]	NORTH [meters]	HEIGHT	HEIGHT	STACK EXIT DATA			FUGITIVES					
										DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [°F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]		
LINE No. 1 EQUIPMENT and DETAILS (Cont'd)																		
EPN HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22	14	700,16 9	3,628,36 8	10		2.5	18.0	200	N/A	N/A				
FIN HTR3		SO ₂	0.01	0.01														
		PM/PM ₁₀	0.01	0.02														
		CO	0.04	0.18														
		VOC	0.01	0.01														
EPN HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO _x	0.05	0.22	14	700,17 0	3,628,36 8	10		2.5	18.0	200	N/A	N/A				
FIN HTR4		SO ₂	0.01	0.01														
		PM/PM ₁₀	0.01	0.02														
		CO	0.04	0.18														
		VOC	0.01	0.01														
EPN CECO1	T-1 & T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17	14	700,17 2	3,628,36 8	16		0.82	1.06	300	N/A	N/A				
FIN CECO1		PM/PM ₁₀	0.01	0.02														
EPN HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	NO _x	0.10	0.43	14	700,18 5	3,628,35 9	30		2.5	30.0	570	N/A	N/A				

[illegible]

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet.
 TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 101.1].

See instructions on reverse side

From: Earl Jones
To: "FBright@gaf.com".GWIA.GATEDOM
Date: 10/20/03 2:18PM
Subject: Re: Dallas - Dust Collection Enhancement Project

Fred, we need to make a best calculated estimate for the cooler exhaust PM and proceed with the permit. If the PM emissions are high compared then they can be reduced by an alteration. I am completing a draft permit which I will e-mail to you for corrections. Thanks Earl

>>> "Bright, Fred" <FBright@gaf.com> 10/20/03 07:58AM >>>
Earl,

We have some current activity at the GAF Dallas Plant that may impact the current permitting efforts and I wanted you to be aware of this activity so you can evaluate how to address this work in your current efforts.

As a result of the unexpectedly high PM values found when stack testing was done on the cooling section exhaust stacks, we performed a review and determined that the shingle back-surfacing sand application needs some enhancements in order to address the sand fines that appear to become airborne and are exhausted by the high volume flow rate of the cooling fans.

Efforts are currently underway to design enhancements to the existing sand application dust control system. Once the design is complete, and we know what the enhancements will involve, we will be submitting a formal air permit application for this work. We would like to have everything completed to implement the necessary modifications during the year-end shutdown. But, realistically, we believe that the work probably won't be able to start until after January 1 and modifications will need to be performed during weekly maintenance shutdown days - which will extend the work into February.

After the modifications are complete, we will again perform a stack test for PM emissions and expect to see a significant reduction in the emission level.

Please let me know if you need any details on project for your current work.
Fred

PS - I may have mentioned this previously: the storage tank vent control project (ducting storage tank vents to the stillyard oxidizer) is complete and up and operating.